



July 16, 2021

*Via ECF*

## MEMO ENDORSED

The Hon. Edgardo Ramos  
United States District Judge  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square, Courtroom 619  
New York, NY 10007

Orrick, Herrington & Sutcliffe LLP

1000 Marsh Road  
Menlo Park, CA 94025

+1 650 614 7400

orrick.com

Jason K. Yu

E jasonyu@orrick.com

D +1 650 614 7363

F +1 650 614 7401

Re: ***Tradeshift, Inc. v. Smucker Services Company, Case No. 1:20-cv-3661-ER: Letter Motion to Seal Exhibits 6 and 8 to Tradeshift's Premotion Responsive Letter Brief Re Smucker Requests for Production of Document Nos. 10-12 and Interrogatory Nos. 7 & 13.***

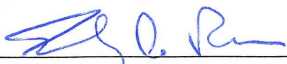
Honorable Judge Edgardo Ramos:

Pursuant to Procedure 3(ii) of the Court's Individual Practices, Plaintiff Tradeshift, Inc. ("Tradeshift") respectfully requests leave to continue sealing of Exhibits 6 and 8 to Tradeshift's Premotion Responsive Letter Brief Re Smucker Requests for Production of Document Nos. 10-12 and Interrogatory Nos. 7 & 13. Tradeshift is filing an under seal copy and a publicly redacted copy of Exhibits 6 and 8 concurrently with this letter motion to seal.

Tradeshift seeks leave to file Exhibits 6 and 8 under seal pursuant to the protective order entered in this case on November 19, 2020. ECF 57. Exhibit 6 is documents certain of Tradeshift's confidential and sensitive financial information. Tradeshift designated the document "Highly Confidential – Attorneys Eyes Only" under the protective order. Exhibit 8 contains excerpts of the transcript from the deposition of Tradeshift's former Chief Financial Officer. The excerpts discuss information for which Tradeshift is subject to confidentiality obligations. Tradeshift has designated the Transcript "Confidential" under the protective order. Moreover the documents are submitted solely for purposes of resolving a discovery dispute.

Accordingly, Tradeshift requests that the Court continue to seal Exhibits 6 and 8 to Tradeshift's Premotion Letter Brief Re Smucker Requests for Production of Document Nos. 10-12 and Interrogatory Nos. 7 & 13 with only the public redacted version of the document being filed in the public docket.

The application is   x   granted  
   denied

  
\_\_\_\_\_  
Edgardo Ramos, U.S.D.J.  
Dated:   07/19/2021    
New York, New York



The Honorable Edgardo Ramos  
July 16, 2021  
Page 2

Respectfully submitted,

*/s/ Jason K. Yu*

Jason K. Yu